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**From:** Jay Rao [JRao@dcorllc.com]  
**Sent:** 10/29/2019 5:23:24 PM  
**To:** Bromley, Eugene [Bromley.Eugene@epa.gov]  
**Subject:** RE: Request for Updated Estimates of Maximum OCS Oil/Gas Related Discharges

Dear Mr. Eugene Bromley,

Good Morning. As we discussed, DCOR , hereby, states that it doesn't want to make any changes to the contents of Tables 3 and 5 of the General NPDES permit.

Thank you.

Jay Rao  
DCOR, LLC

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**From:** Bromley, Eugene <Bromley.Eugene@epa.gov>  
**Sent:** Thursday, October 24, 2019 10:31 AM  
**To:** 'Greg Southworth' <greg@southworthconsulting.com>; James Durbin <james.durbin@c-ka.com>; thomas.f.parkerton@exxonmobil.com; 'Rose, David' <drose@fmi.com>; 'Bosch, Mandie' <Mandie.Bosch@chevron.com>; Jay Rao <JRao@dcorllc.com>; 'Diana Lang' <Diana.Lang@amplifyenergy.com>; 'STEVE LAWRY' <lawrylts@sbcglobal.net>; 'Clem Alberts' <alberts@pacops.com>; 'Surmeier, Patrice A /C' <patrice.a.surmeier@exxonmobil.com>; 'Floyd, Jim' <Jim.Floyd@chevron.com>; 'Changyong Zhang' <changyong.zhang@exxonmobil.com>; John Garnett <john.garnett@beacon-west.com>  
**Cc:** Goldsmith, Sara <Goldsmith.Sara@epa.gov>  
**Subject:** Request for Updated Estimates of Maximum OCS Oil/Gas Related Discharges

Good Morning,

In June 2019, we distributed for review a pre-public notice draft general permit and fact sheet for OCS oil and gas facilities in Region 9. This permit would replace the existing general permit No. CAG280000 that became effective in early 2014.

Tables 3 and 5 of the draft permit specify maximum annual discharges of drilling muds and cuttings, excess cement and produced water for each platform. These limits (see attached Tables 3 and 5) are the same as the limits in the 2014 permit and nearly the same as in the 2004 permit.

Given that several platforms are being decommissioned (e.g., Platforms Harvest, Hermosa, Gail and Grace), and certain others have recently ceased routine discharges of produced water (e.g., Platforms A, B and Gina), the California Coastal Commission has requested that we reconsider the limits in Tables 3 and 5.

The discharge limits in Tables 3 and 5 are based on estimates provided by permittees about 20 years ago of potential operational needs at that time. This memo requests that you provide to Region 9 updated estimates (based on current operational needs) of potential maximum annual discharges of drilling muds and cuttings, excess cement and produced water for each platform. These volume limits are useful in estimating the maximum potential impacts of the discharges.

We request that the updated estimates be provided within the next two weeks. Thank you for your cooperation in the matter.

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